CALIFORNIA RICE COMMISSION

June 26, 2007

Ms. Margie Lopez-Read, REAII, Chief
Monitoring and Assessment Unit
Irrigated Lands Conditional Waiver Program
Central Valley Regional Water
Quality Control Board
11020 Sun Center Drive
Rancho Cordova, CA 95670

Dear Ms. Lopez-Read:

Thank you for the opportunity to comment on the *Draft 2007 Review of Monitoring Data for the Irrigated Lands Conditional Waiver Program*. The California Rice Commission (CRC) appreciates the dedication of the Central Valley Regional Water Quality Control Board (CVRWQCB) staff in developing these documents.

Per your email message, the CRC is providing comments by June 27, 2007. The CRC comments include minor corrections to pesticide use in Zone 1, and include clarification of the Basin Plan prohibition of discharge in Zones 2 and 3. In addition, the CH2M Hill memo provides comments as an enclosure to this letter.

**SECTION II. ZONE DATA SUMMARIES – ZONE 1**
Page Z1-21
Please revise the sentence to reflect the following, "The California Rice Commission in Zone 1 is developing an alternative approach to identifying algae toxicity, ~~which may provide information that will lead to appropriate management practices~~."

Algae reductions are a persistent problem throughout Region 5, including non-rice growing areas. Several samples, resamples, dilution series and toxicity identification evaluations have not conclusively detected a cause to algae reductions. The CRC is taking a proactive approach to identifying the causal factor, which may benefit agriculture throughout Region 5. The words, "which may provide information that will lead to appropriate management practices," indicates that rice field discharges cause algae reductions.

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**SECTION II. ZONE DATA SUMMARIES – ZONE 2**

Page Z2-11

The Basin Plan prohibition of discharge program applies to all rice grown in the Sacramento River and the San Joaquin River Basins for rice field discharges of carbofuran, malathion, methyl parathion, molinate and thiobencarb. Carbofuran is no longer a rice pesticide and no rice field applications of malathion or methyl parathion took place in Zone 2 from 2004-2006. Molinate and thiobencarb are specifically rice herbicides and no other crop residue tolerances (registrations) exist. The CRC receives pesticide use information for malathion, methyl parathion, molinate and thiobencarb from all rice counties, but only records use from the Sacramento River Basin in the annual report. Molinate and thiobencarb use must comply with the DPR permit conditions (management practices), which applies to all rice acreage in the Sacramento River and San Joaquin River Basins. Clarification of this point is critical to the CRC and, if necessary, we request a meeting to fully understand staff's interpretation preceding the workshop.

Page Z2-12

**Table Z2-6. Summary of Detections of Pesticides Under Basin Plan Prohibition**

Please revise the table to correctly reflect the prohibition of discharge for molinate and thiobencarb. Please omit any detection for molinate of 10.0 micrograms per liter of water (ug/L) or less, and thiobencarb of 1.5 ug/L or less.

Page Z2-14

The reference to a thiobencarb detection should be checked and not mentioned if it is 1.5 ug/L or less.

Page Z2-19

Thiobencarb is not a prohibited pesticide, so please remove that statement and revise the detections. A prohibition of discharge does not exist for thiobencarb when detections are 1.5 ug/L or less.

Pages Z2-20 to 23

**Table Z2-9. Summary of Pesticide Monitoring Results Above Trigger Levels**

The table lists thiobencarb with four detections above the trigger level. Please check and remove from the table if the thiobencarb detection was 1.5 ug/L or less.

**SECTION II. ZONE DATA SUMMARIES – ZONE 3**

Pages Z3-9 to 12

**Table Z3-3. List of Pesticide Detects**

Page Z3-11. Please correctly reflect the molinate detections in the table. The prohibition of discharge allows detections of molinate at 10.0 ug/L. In the table, 2 of 206, or 1.5% of the molinate samples resulted in detections ranging from 0.035 to 0.042 ug/L. The detections were inaccurately indicated to exceed the water quality trigger of 0 ug/L.

Page Z3-12. Please correctly reflect the thiobencarb detections in the table. The prohibition of discharge allows detections of thiobencarb at 1.5 ug/L. In the table, 6 of 206, or 3% of the thiobencarb samples resulted in detections ranging from 0.016 to 1.5 ug/L. The detections were inaccurately indicated to exceed the water quality trigger of 0 ug/L.

Page Z3-14.
The Basin Plan prohibition of discharge program applies to all rice grown in the Sacramento River and the San Joaquin River Basins for rice field discharges of carbofuran, malathion, methyl parathion, molinate and thiobencarb. Carbofuran is no longer a rice pesticide and no rice field applications of malathion or methyl parathion took place in Zone 2 from 2004-2006. Molinate and thiobencarb are specifically rice herbicides and no other crop residue tolerances (registrations) exist. The CRC receives pesticide use information for malathion, methyl parathion, molinate and thiobencarb from all rice counties, but only records use from the Sacramento River Basin in the annual report. Molinate and thiobencarb use must comply with the DPR permit conditions (management practices), which applies to all rice acreage in the Sacramento River and San Joaquin River Basins. Clarification of this point is critical to the CRC and, if necessary, we request a meeting to fully understand staff's interpretation preceding the workshop.

Page Z3-14.
**Table Z3-5. Frequency of Select Pesticide Detections**
Pesticides Under a Basin Plan Prohibition of Discharge
The pesticides carbofuran, malathion, methyl parathion, molinate and thiobencarb inaccurately reflect a trigger limit of 0 ug/L. The prohibition of discharge is effective for non-rice field applications of carbofuran, malathion and methyl parathion. Please revise the table to accurately reflect acceptable detections for rice field discharges: malathion 0.4 ug/L, methyl parathion 0.13 ug/L, molinate 10.0 ug/L and thiobencarb 1.5 ug/L. Carbofuran in no longer a rice pesticide.

**ATTACHMENT A. TRIGGER LIMITS USED FOR ZONE DATA REVIEW**
Zone 1: Pages A-3, A-5, A-7
Molinate: The Basin Plan performance goal is 10.0 ug/L. Please delete "or 0 ug/L" as it does not apply. Molinate is specifically a rice herbicide and no other crop residue tolerances (registrations) exist.

Thiobencarb: The Basin Plan performance goal is 1.5 ug/L. The water quality objective for municipal or domestic water supplies is 1.0 ug/L for taste. Compliance with the performance goal assures conformity with the water quality objective of 1.0 ug/L. Please delete "or 0 ug/L" as it does not apply. Thiobencarb is specifically a rice herbicide and no other crop residue tolerances (registrations) exist.

**ATTACHMENT B. CROP AND PESTICIDE USE ZONES 1, 2 AND 3**
Butte and Colusa Counties:
The report lists fluridone (CAS No. 59756-60-4) as a rice pesticide. In California, fluridone uses exist for landscape maintenance, regulatory pest control, rights of way, structural pest control and water areas (Department of Pesticide Regulation (DPR), Pesticide Use Report (PUR) 2004, 2005). No crop uses exist in California even though registrations exist on several commodities, excluding rice (Title 40 Code of Federal Regulations (CFR) §180.420). Fluridone is not a rice pesticide because no residue tolerance (40CFR§180.420) exists resulting in no registration of this product on rice.

Please include propiconazole because it is a combination product with trifloxystrobin in the formulated fungicide Stratego.

Glenn County:
Please remove the fumigant aluminum phosphide, since it is not a pesticide applied to a rice crop. In 2005, 1,280 tons of rice received 26.95 pounds active ingredient (AI) at either a mill or dryer.

Registration of the insecticide methyl parathion exists on rice. However, use is declining due to decreasing efficacy. In 2005, 82 acres of rice received a formulated insecticide containing methyl parathion, toxaphene and xylene, which accounts for separate listings of these products on the DPR PUR.

Yolo County:
Please remove the two fumigant pesticides aluminum phosphide and methyl bromide because they are not pesticides applied to a rice crop. In 2005, 49,500 tons of rice received 6.60 pounds AI of aluminum phosphide at either a mill or dryer. A structural fumigation of methyl bromide took place with 399 pounds AI to 199,500 cubic feet.

Yuba County:
Please remove the fumigant aluminum phosphide, since it is not a pesticide applied to a rice crop. In 2005, 125,000 units received 90.5773 pounds active ingredient (AI) at either a mill or dryer.

Registration of the insecticide methyl parathion exists on rice. However, use is declining due to decreasing efficacy. In 2005, 32 acres of rice received a formulated insecticide containing methyl parathion, and xylene, which accounts for separate listings of these products on the DPR PUR.

Thank you for working with us to develop the documents for the 2007 Review of Monitoring Data for the Irrigated Lands Conditional Waiver Program. CH2M Hill prepared additional comments on the Executive Summary, provided as a separate enclosure. The CRC greatly appreciates the collaboration between the CVRWQCB staff and the coalitions on this project. Please contact me, or Roberta Firoved, if you have any questions or concerns.

Sincerely,

Timothy A. Johnson
President & CEO

cc: Roberta Firoved

Enclosure